

## EXHIBIT 222

1 UNITED STATES DISTRICT COURT  
 2 FOR THE NORTHERN DISTRICT OF OHIO  
 3 EASTERN DIVISION

4 - - -

4 IN RE: NATIONAL )  
 PRESCRIPTION ) MDL No. 2804  
 5 OPIATE LITIGATION )  
 \_\_\_\_\_ ) Case No.  
 6 ) 1:17-MD-2804  
 THIS DOCUMENT RELATES )  
 7 TO ALL CASES ) Hon. Dan A. Polster

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9 THURSDAY, NOVEMBER 15, 2018  
 10 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
 CONFIDENTIALITY REVIEW

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12  
 13 Videotaped deposition of Mark Hartman,  
 14 held at the offices of BakerHostetler, 200 Civic  
 15 Center Drive, Suite 1200, Columbus, Ohio, commencing  
 16 at 9:06 a.m., on the above date, before Carol A. Kirk,  
 17 Registered Merit Reporter and Notary Public.

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 21  
 22  
 23 GOLKOW LITIGATION SERVICES  
 877.370.3377 ph | 917.591.5672 fax  
 24 deps@golkow.com

1 least according to the e-mail, when?

2 A. December 19, 2007.

3 Q. Okay. And let me ask, had you  
4 left Cardinal for a brief period at that point?

5 A. Hadn't left. We were going  
6 through a reorganization. My position was being  
7 eliminated, the one I was in previously, so we  
8 were looking for roles inside of the company and  
9 I was looking externally as well.

10 This position became available,  
11 and Cardinal offered it to me. So there was  
12 about a month in there between that role ending  
13 that I was in and then this role coming up.

14 Q. So were you actually unemployed  
15 during that time?

16 A. No, I was still a Cardinal  
17 employee.

18 Q. You just didn't have a spot?

19 A. That's right.

20 Q. Fair enough. Fair enough.

21 And if you will, read the first  
22 sentence for us.

23 A. Of the announcement?

24 Q. Yes, sir.

1           A.     "We are pleased to announce the  
2     appointment of Mark Hartman to the position of  
3     Senior Vice President, Supply Chain Integrity  
4     and Regulatory Operations for HSCS reporting to  
5     both of us."

6           Q.     And "both of us" indicates who?

7           A.     And -- let's see.

8           Q.     If you look at the front section.

9           A.     So that's Jeff Henderson and  
10    Gary Dolch.

11          Q.     And who is Mr. Henderson; do you  
12    know?

13          A.     Yes. He's the -- he was the chief  
14    financial officer at the time and the interim  
15    CEO.

16          Q.     And the CEO for Healthcare Supply  
17    Chain Services, correct?

18          A.     HS -- yeah, yes, that's correct.

19          Q.     The acronym that we were  
20    struggling with earlier?

21          A.     Correct.

22          Q.     And who is Mr. Dolch?

23          A.     EVP quality and regulatory  
24    affairs.

1     says, "Media reports of OxyContin abuse and  
2     diversion began to surface in 2000. These  
3     were -- reports first appeared in rural areas of  
4     some states, generally in the Appalachian  
5     region, continued to spread to other rural areas  
6     and larger cities in several states. Rural  
7     communities in Maine, Kentucky, Ohio,  
8     Pennsylvania, Virginia, and West Virginia were  
9     reportedly being devastated by the abuse and  
10    diversion of OxyContin."

11                   And then if we go on to the next  
12    page, sir, about halfway down, that first  
13    paragraph, "The media also reported on deaths  
14    due to OxyContin. For example, a newspaper's  
15    investigation of autopsy reports involving  
16    oxycodone-related deaths found that OxyContin  
17    had been involved in over 200 overdose deaths in  
18    Florida since 2000."

19                   Were you aware, sir, that there  
20    were certain parts of the country that were  
21    being affected more significantly than other  
22    parts of the country when it came to the opioid  
23    epidemic?

24                   A.     During what time period?